1	ADAM PAUL LAXALT Attorney General		
$2 \mid$	JARED M. FROST (Bar No. 11132) Senior Deputy Attorney General		
3	State of Nevada Office of the Attorney General		
4	555 East Washington Avenue Suite 3900		
5	Las Vegas, Nevada 89101 (702) 486-3177 (phone)		
6	(702) 486-3773 (fax) Email: jfrost@ag.nv.gov		
7	Attorneys for Defendants State of Nevada ex rel the Nevada Department of Corrections and Rick L. Brown		
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12	UNITED STATES DISTRICT COURT		
13	DISTRICT OF NEVADA		
14 15	MARTY FURTADO, an individual; MARTY FURTADO, SPECIAL ADMINISTRATOR OF ESTATE OF ANDREW THURGOOD,	Case No. 2:18-cv-00188-APG-PAL	
16	Plaintiffs,		
17	v.		
18	STATE OF NEVADA, ex rel, NEVADA DEPARTMENT OF CORRECTIONS: ADAM	STIPULATION AND ORDER TO	
19	MICHAEL ISAACSON, an individual; ANTHONY M. WILLIAMS, an individual;	EXTEND TIME FOR RICK L. BROWN TO RESPOND TO THE AMENDED COMPLAINT	
20	OFFICER RUBEN R. JIMENEZ, acting in his individual capacity; OFFICER RICK L.	(First Request)	
21	BROWN, acting in his individual capacity; DOES 1-20,	(First Request)	
22	DOES 1-20,		
23	Defendants.		
24	Plaintiff Marty Furtado, by and through his attorney, Travis N. Barrick, Esq., and		
25	Defendant Rick L. Brown, by and through counsel, Adam Paul Laxalt, Nevada Attorney		
26	General, and Jared M. Frost, Senior Deputy Attorney General, hereby stipulate and agree		
27	that the time for Rick L. Brown to respond to the Amended Complaint shall be extended		
28	for an additional sixty (60) days.		

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On April 18, 2018, Plaintiff filed an Amended Complaint. ECF No. 5. On April 20, 2018, the Court issued summonses directed to the State of Nevada ex rel the Nevada Department of Corrections, Ruben R. Jimenez, Rick L. Brown, Adam Michael Isaacson, and Anthony M. Williams. ECF No. 7. Also on April 20, 2018, Plaintiff's counsel provided service waivers for Defendants Ruben R. Jimenez and Rick L. Brown. On May 2, 2018, Plaintiff served the State of Nevada and Rick L. Brown with a Summons and Complaint.

The parties here state that there is good cause for the extension. Defendant Brown recently retired from State service, and defense counsel is currently in the process of reestablishing contact with him for litigation purposes. In addition, Defendants have informed Plaintiff that Rick L. Brown appears to have been improperly named in the Amended Complaint because he has never worked at High Desert State Prison. Lastly, Plaintiff is still trying to complete service on the remaining individually-named defendants. For all these reasons, the parties have agreed to extend the time for Rick L. Brown to respond to the Amended Complaint for an additional sixty (60) days.

GALLIAN WELKER & BECKSTROM, LC ADAM PAUL LAXALT Attorney General

By: <u>/s/ Travis N. Barrick</u> Date: <u>06-19-18</u>
Travis N. Barrick
Nevada Bar No. 9257
540 E. St. Louis Avenue
Las Vegas, NV 89104
Attorneys for Plaintiff

By: <u>/s/ Jared M. Frost</u> Date: <u>06-19-18</u> Jared M. Frost Nevada Bar No. 11132 555 E. Washington Avenue, Ste. 3900 Las Vegas, NV 89101 Attorneys for Defendants

**SO ORDERED.** Defendant Rick L. Brown shall respond to the Amended Complaint no later than August 17, 2018.

Dated this 12th day of July, 2018.

UNITED STATES MAGISTRATE JUDGE